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Attorneys for Defendants
CBS RADIO INC. (formerly known as "Infinity
Broadcasting Corporation")

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TERRY SAIDEL and CAMILLE
JACKSON, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

CBS RADIO, INC., a Delaware
corporation, and DOES 1 through 10,
inclusive,

Defendants.

Case No. C-07-2948 SC

**STIPULATION REGARDING
DESIGNATION OF *CY PRES*
BENEFICIARY AND [PROPOSED]
ORDER**

1. WHEREAS, Plaintiffs Terry Saidel and Camille Jackson (collectively as "Plaintiffs") and Defendant CBS Radio Inc. ("Defendant") (collectively as "the Parties") executed a Joint Stipulation of Class Action Settlement and Release on July 15, 2008 ("Joint Stipulation");

2. WHEREAS, the Court finally approved the Joint Stipulation and entered judgment accordingly on December 5, 2008 ("Final Approval Order");

3. WHEREAS, pursuant to the Joint Stipulation approved by the Court, after nine (9) months from the Effective Settlement Date, any residual amount remaining in the Net Settlement Fund or Reserve Fund after all payments have been made pursuant to the Joint Stipulation shall be paid to a *cy pres* beneficiary agreed upon by the Parties and approved by the Court;

1 4. WHEREAS, all payments have been made pursuant to the Joint Stipulation
2 approved by the Court;

3 5. WHEREAS, no residual amount remains in the Net Settlement Fund, but the
4 residual amount of \$13,449.26 remains in the Reserve Fund;

5 5. WHEREAS, the Parties agree to designate InnVision as the *cy pres* beneficiary;

6 6. WHEREAS, InnVision is an organization which seeks to empower homeless and
7 at-risk families and individuals through housing and day programs throughout Santa Clara and
8 San Mateo counties.

9 THEREFORE, the Parties, by and through their counsel of record, hereby respectfully
10 request that the Court:

- 11 a. Approve the Parties' agreed-upon *cy pres* beneficiary of InnVision;
12 b. Order that any costs associated with administering the residual amount
13 be deducted from the residual amount before the *cy pres* distribution; and
14 c. Order that the Settlement Administrator, Simpluris, Inc., pay over the

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residual amount, minus costs associated with administering the residual amount, to InnVision within thirty (30) days from the date of this Order.

HINTON, ALFERT & SUMNER

DATED: August 14, 2009

By: /s/ David P. Pogrel
David P. Pogrel, Esq.
Attorneys for Plaintiffs and Settlement
Class

MORGAN LEWIS & BOCKIUS

DATED: August 14, 2009

By: /s/ Theresa Mak
Theresa Mak, Esq.
Attorneys for Defendants
CBS RADIO INC. (formerly known as
"Infinity Broadcasting Corporation")

IT IS SO ORDERED.

DATED: August 17, 2009.



THE HONORABLE SAMUEL CONTI
UNITED STATES DISTRICT JUDGE